

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF: FRANKLIN



POLICE CRIMINAL COMPLAINT
COMMONWEALTH OF PENNSYLVANIA
VS.

Magisterial District Number: 39-3-02
MDJ Name: Hon. LARRY PENTZ
Address: 22 NORTH OLLER AVENUE
WAYNESBORO, PA 17268
Telephone: 717-762-9411

DEFENDANT: (NAME and ADDRESS):
KEVIN MATHEW CLEEVES
First Name Middle Name Last Name Gen.
601 WEST MAIN STREET
APT. #2
WAYNESBORO, PA 17268

NCIC EXTRADITION CODE TYPE

☒ 1-Felony Full ☐ 4-Felony No Ext. ☐ B-Misdemeanor Limited ☐ E-Misdemeanor Pending
☐ 2-Felony Ltd. ☐ 5-Felony Pend. ☐ C-Misdemeanor Surrounding States Distance:
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ D-Misdemeanor No Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number CR-288-12 Date Filed 07/28/12 OTN/LiveScan Number T213555-6 Complaint/Incident Number H03-2138707 SID: Request Lab Services? ☐ YES ☒ NO

GENDER ☒ Male ☐ Female DOB 01/15/77 POB MICHIGAN Add'l DOB Co-Defendant(s) ☐
AKA First Name: Middle Name: Last Name: Gen.

RACE ☒ White ☐ Asian ☐ Black ☐ Native American ☐ Unknown

ETHNICITY ☐ Hispanic ☒ Non-Hispanic ☐ Unknown

HAIR COLOR ☐ GRY (Gray) ☐ RED (Red / Auburn.) ☐ SDY (Sandy) ☐ BLU (Blue) ☐ PLE (Purple) ☒ BRO (Brown)
☐ BLK (Black) ☐ ONG (Orange) ☐ WHI (White) ☐ XXX (Unk. / Bald) ☐ GRN (Green) ☐ PNK (Pink)
☐ BLN (Blonde / Strawberry)

EYE COLOR ☐ BLK (Black) ☒ BLU (Blue) ☐ BRO (Brown) ☐ GRN (Green) ☐ GRY (Gray)
☐ HAZ (Hazel) ☐ MAR (Maroon) ☐ PNK (Pink) ☐ MUL (Multicolored) ☐ XXX (Unknown)

Driver License State PA License Number 29574999 Expires: 01/16/16 WEIGHT (lbs.)

DNA ☐ YES ☐ NO DNA Location 170

FBI Number MNU Number Ft. HEIGHT In.

Defendant Fingerprinted ☐ YES ☐ NO 5 10

Fingerprint Classification

DEFENDANT VEHICLE INFORMATION

| | | | | | | | |
|---------|-------|---------------------------------|------------------------------|---|--------------------------------------|---------------------|--|
| Plate # | State | Hazmat <input type="checkbox"/> | Registration Sticker (MM/YY) | Comm'l Veh. Ind. <input type="checkbox"/> | School Veh. <input type="checkbox"/> | Oth. NCIC Veh. Code | Reg. same as Def. <input type="checkbox"/> |
| VIN | Year | Make | Model | Style | Color | | |

Office of the Attorney for the Commonwealth ☐ Approved ☐ Disapproved because:
(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. Pa.R.Crim.P.507.)

(Name of Attorney for Commonwealth - Please Print or Type)

(Signature of Attorney for Commonwealth)

(Date)

I, TPR. AARON MARTIN
(Name of Affiant - Please Print or Type)

00465852/07787
(PSP/MP/OTC - Assigned Affiant ID Number & Badge #)

of the Pennsylvania State Police, Troop H, Chambersburg
(Identify Department or Agency Represented and Political Subdivision)

PAPSP1200
(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above
☐ I accuse the defendant whose name is unknown to me but who is described as
☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe or Jane Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at: 211 DRIVEWAY AT 7705 ANTHONY HIGHWAY,
(Subdivision Code) WAYNESBORO, QUINCY TWP.
(Place-Political Subdivision)

in FRANKLIN County (County Code) 28 on or about



POLICE CRIMINAL COMPLAINT

| | | | |
|-----------------------------------|------------------------|--|--|
| Docket Number CR-288-12 | Date Filed 07/28/12 | OTN/LiveScan Number T 213555-6 | Complaint/Incident Number H03-2138707 |
| Defendant Name | First: KEVIN | Middle: MATHEW | Last: CLEEVES |

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a *brief* summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 - 213.7.)

| | | | |
|---------------------|--|---|---|
| Inchoate Offense | <input type="checkbox"/> Attempt 18 901 A | <input type="checkbox"/> Solicitation 18 902 A | <input type="checkbox"/> Conspiracy 18 903 |
|---------------------|--|---|---|

| | | | | | | | | | |
|--------------------------------|----------|-------------|--------------------|---------------|----------------------------------|----------|-------------|-------------------|----------------|
| <input type="checkbox"/> Lead? | 1 | 2501 | (a) | of the | Title 18 , PA Crimes Code | 3 | 0901 | 01A | |
| Offense # | Section | Subsection | PA Statute (Title) | | | Counts | Grade | NCIC Offense Code | UCR/NIBRS Code |

| | | | |
|---------------------------------|--------------------|--------------------------------------|------------------------------------|
| PennDOT Data (if applicable) | Accident Number | <input type="checkbox"/> Safety Zone | <input type="checkbox"/> Work Zone |
|---------------------------------|--------------------|--------------------------------------|------------------------------------|

Statute Description (include the name of statute or ordinance):

COUNT #1, #2, #3: PA CRIMES CODE SECTION 2501 (a) CRIMINAL HOMICIDE

Acts of the accused associated with this Offense:

In that, on or about said date, the Defendant did intentionally and knowingly cause the death of another human being; To wit, the Defendant Kevin Mathew CLEEVES did shoot victims Brandi K. CLEEVES, Vincent L. SANTUCCI II, and Rosemary L. HOLMA with a firearm causing their deaths.



POLICE CRIMINAL COMPLAINT

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| Defendant Name | First: KEVIN | Middle: MATHEW | Last: CLEEVES |

2. I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
3. I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S.§4904) relating to unsworn falsification to authorities.
4. This complaint consists of the preceding page(s) numbered __ through __

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.)

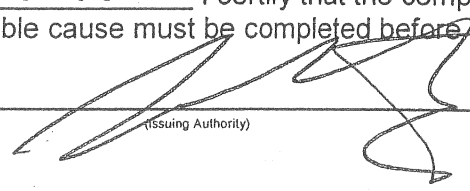
JULY 28, 2012
(Date)

 #7787
(Signature of Affiant)

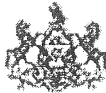
AND NOW, on this date, July 28, 2012 I certify that the complaint has been properly completed and verified. An affidavit of probable cause must be completed before a warrant can be issued.

39-3-02

(Magisterial District Court Number)


(Issuing Authority)

SEAL



POLICE CRIMINAL COMPLAINT

| | | | |
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AFFIDAVIT of PROBABLE CAUSE

On 07/27/12 at approx. ²¹⁰⁰~~0900~~ hrs., a shooting incident resulting in multiple deaths occurred on a driveway at 7705 Anthony Highway, Waynesboro, Quincy Twp., Franklin County, PA--within the jurisdiction of the PA State Police and this officer.

On 07/27/12 I was assigned to investigate three criminal homicides that occurred at a driveway located at 7705 Anthony Highway, Waynesboro, PA.. PSP Chambersburg received notification via 911 that multiple gun shots had been heard in the area at approx. 2100 hrs. Cpl. Rodney ANDERSON of PSP Chambersburg arrived on scene and confirmed that there were three victims of gunshot wounds. The victims were ultimately determined to be deceased and were identified as Brandi K. CLEEVES, Vincent L. SANTUCCI, and Rosemary L. HOLMA.

On 07/27/12 at approx. 2305 hrs. I was contacted by Sgt. Frank MRAZ of the Michigan State Police. Sgt. MRAZ related that Kevin M. CLEEVES had contacted his family in Eaton Rapids, MI and admitted to the shootings. Sgt. MRAZ provided me with the contact information for Bradner and Valerie SMITH of Eaton Rapids, MI. Bradner and Valerie SMITH are the uncle and aunt of Kevin CLEEVES.

On 07/27/12 at approx. 2315 hrs. I interviewed Valerie D. SMITH of Eaton Rapids, MI via telephone. SMITH related that her nephew, Kevin CLEEVES, had called her at approx. 2155 hrs. on this date. SMITH related that CLEEVES was drinking and mad. CLEEVES told SMITH that he went to SANTUCCI'S house to get his daughter, Leia. CLEEVES related that SANTUCCI told him that Leia was his daughter and told him to get off his property. CLEEVES told SMITH that he shot SANTUCCI. Then Brandi CLEEVES jumped out of the vehicle, and he shot her too. SANTUCCI'S mother came running out of the house, and he shot her too. Kevin CLEEVES related that he then took his daughter, Leia, and fled the scene. I advised SMITH to have Kevin CLEEVES contact me if he were to call her again.

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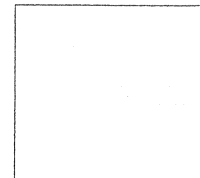
I, TPR. AARON MARTIN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

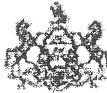
TPR. A. B. B. #7787

(Signature of Affiant)

Sworn to me and subscribed before me this 28th day of July 2012
7/28/12 Date [Signature], Magisterial District Judge

My commission expires first Monday of January, 2018





POLICE CRIMINAL COMPLAINT
AFFIDAVIT CONTINUATION PAGE

| | | | |
|------------------------------------|-------------------------|---|--|
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AFFIDAVIT of PROBABLE CAUSE CONTINUATION

On 07/28/12 at approx. 0015 hrs., I was contacted by Kevin CLEEVES at PSP Chambersburg. CLEEVES related that he messed up. He related that he went to SANTUCCI'S house to get his daughter back. He related that he had been trying to contact his wife, Brandi, to make arrangements to pick his daughter up. Brandi would not answer his phone calls or messages. He related that he was making sure that his daughter was safe, because her mother was a "[REDACTED] joke". He related that he went over to SANTUCCI'S house, and saw his wife and SANTUCCI in a car. His daughter was in the car as well. CLEEVES related that he confronted SANTUCCI and Brandi in the driveway by SANTUCCI'S house. SANTUCCI told Kevin CLEEVES to get off his property, and argued with him about his daughter. CLEEVES related that he shot SANTUCCI in his car. CLEEVES related that Bradi then jumped out, and he shot her too. CLEEVES related that some woman that he believed to be SANTUCCI'S mother ran up towards him, and he shot her. CLEEVES related that what he did was wrong, and he should have never gone over to SANTUCCI'S house. CLEEVES related that he then took his daughter, Leia, and fled the scene. CLEEVES related that he was trying to get to Michigan, because he wanted to have his daughter stay with his aunt.

Based upon the information detailed in the above affidavit, there is probable cause to set forth the charges listed on this criminal complaint.

TPM. H325 #7747

(Signature of Affiant)